

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

**JEFFREY DuPRIEST and
RACHEL GILMORE**

PLAINTIFFS

v. CASE NO. _____

ALLSTATE INSURANCE COMPANY

DEFENDANT

CLASS ACTION COMPLAINT

I. INTRODUCTION

1. Plaintiffs Jeffrey DuPriest and Rachel Gilmore were each involved in separate vehicular accidents that resulted in total losses. At the time of the accidents, DuPriest was driving a 2003 Honda VTX1800C Cruiser when he had a wreck on October 6, 2016. Gilmore was driving a 2005 Toyota Corolla S when she had an accident on November 16, 2016. Both Plaintiffs insured their vehicles with Allstate Insurance Co., who declared the vehicle a total loss. After the vehicles were declared total losses, Allstate made cash settlement offers of \$3,657 and \$5,238, respectively, based on a CCC One Market Valuation Report. Allstate uses the CCC One Report in adjusting its

total loss claims. The CCC One Report systematically undervalues the insureds' vehicles, resulting in a payment of less than the actual cash value for all total loss claims, saving Allstate millions of dollars each year at the expense of its insured motorists.

2. Allstate's use of CCC One Reports to value total loss claims violates its contracts with its insureds and Arkansas law. Allstate is required to calculate actual cash value through either: (a) the cost of a specific, comparable replacement automobile, or (b) using one of two or more quotations obtained from two or more qualified dealers or appraisal services located within the local market area. Instead of following Arkansas law Allstate uses the CCC One Report to cheat their policyholders and to increase its own profits. Plaintiffs bring this suit on behalf of themselves and others similarly situated to recover the difference between the actual cash value of their vehicles and what they were paid, punitive damages, costs, and attorneys' fees. Plaintiffs also ask the Court to declare that the use of the CCC One Report to adjust first-party insurance claims violates Arkansas law and to permanently enjoin its use.

II. PARTIES, JURISDICTION, AND VENUE

3. Plaintiff Jeffrey DuPriest is a resident and citizen of Pulaski County, Arkansas. At all times relevant to this Complaint, he had a motor vehicle insurance policy with Allstate and had a total-loss claim.

4. Plaintiff Rachel Gilmore is a resident and citizen of Pulaski County, Arkansas. At all times relevant to this Complaint, she had a motor vehicle insurance policy with Allstate and had a total-loss claim.

5. Defendant Allstate is incorporated in the State of Delaware and has its principal place of business in Northbrook, Illinois. It is licensed to do business in the State of Arkansas. Further, because this is a direct action against Allstate, it is also a citizen of each state of which Plaintiffs and all putative class members are Citizens. 28 U.S.C. § 1332(c)(1). Thus, Allstate is also citizen of Arkansas because the Plaintiffs and putative class members are citizens of Arkansas.

6. This Court has subject matter jurisdiction pursuant to Ark. Const. amend. 80, § 6 and Ark. Code Ann. § 16-13-201.

7. Venue is proper in this Court because Plaintiffs resided in Pulaski County at the time of the events giving rise to the cause of action , and the incidents occurred in Pulaski County . Ark. Code Ann. § 16-60-101.

III. FACTUAL ALLEGATIONS

8. In October of 2016, DuPriest was driving a 2003 Honda VTX1800 Cruiser motorcycle and was involved in a motor vehicle accident which resulted in substantial damage to his vehicle. DuPriest had an insurance policy with Allstate and submitted a claim to his insurer on October 11, 2016 and received an estimate on or about October 11, 2016.

9. In November of 2016, Gilmore was driving a 2005 Toyota Corolla S and was involved in a motor vehicle accident which resulted in substantial damage to her vehicle. Gilmore had an insurance policy with Allstate and submitted a claim to her insurer on November 21, 2016.

10. The Plaintiffs' insurance policies with Allstate each contained a clause providing for the adjustment and settlement of total loss claims based on "actual cash value or replacement with another of like kind or quality." Upon information and belief, this is Allstate's standard automobile insurance policy issued to insureds in the state of Arkansas.

11. Allstate used reports from a third-party corporation known as a CCC One Report to adjust Plaintiffs' claims. CCC One Information Services, Inc. sells automobile valuation information primarily to insurance companies for settling total loss vehicle claims. The CCC One Report is sold

almost solely to insurance companies, and it is marketed as reducing the costs of total value settlements. Upon information and belief, Allstate uses the CCC One Report to calculate its offers of all total loss claims.

12. Allstate presented the CCC One report to Plaintiffs as representing the “actual cash value” of their vehicles, and, based on the CCC One Report, Allstate paid to settle the total loss claims. *See* CCC One Reports, attached as Exhibits 1 and 2. Allstate paid “base values” of \$3,657 to DuPriest and \$5,238 to Gilmore.

13. Plaintiffs’ vehicles, however, were worth more than shown on the CCC One Report. With respect to DuPriest’s motorcycle, NADA Guides, which provides pricing information for motorcycles lists the average retail price as \$3,925, with a “low retail” price of \$2,985. *See* NADA Guide, attached as Exhibit 3. The vehicles that were used for comparison in the CCC One Report were not “in the local market,” as two were over 250 miles away in Oklahoma and Texas. A search for identical vehicles for sale in the immediate area found that a vehicle of similar make, model, mileage, and condition was listed in Jonesboro for \$4,499. *See* Used Honda for sale in Jonesboro, obtained on February 26, 2019, attached as Exhibit 4. He ultimately received \$3,657 for his vehicle.

14. A search for vehicles similar to Ms. Gilmore's near her home showed three available. Two of these had over 100,000 more miles than hers, yet sold for \$2,800 and \$3,500. A car of the same year with mileage comparable to hers was available for \$5,495. See Vehicles for Sale, attached as Exhibit 5. She ultimately received \$5,238 for her trade-in.

15. The CCC One Report systematically undervalues vehicles by making a series of arbitrary and unexplained adjustments to the vehicles contained in the report. These adjustments serve to immediately lower the cash price paid to covered parties.

16. Allstate knows that the CCC One Report undervalues vehicles. Despite knowing that the CCC One Report undervalues vehicles, Allstate continues to use it to determine the amount to pay claimants.

17. Arkansas law requires that Allstate, when adjusting or settling first party automobile total losses, either provide a replacement vehicle, provide a cash settlement based on a specific replacement vehicle if one is available in the local market area, or use "one (1) of two (2) or more quotations obtained by the insurer from two (2) or more qualified dealers or appraisal services located within the local market area when a comparable automobile is located in the local market area." Ark. Ins. Regulation 43,

§ 10(a)(2). If the insurer deviates from one of those methods, the deviation must be supported by documentation giving particulars of the automobiles condition, and “[a]ny deductions from such cost, including deduction for salvage, must be measurable, discernable, itemized, and specified as to dollar amount and shall be appropriate in amount.” Ark. Ins. R. 43, § 10(a)(3). Further, “[t]he basis for such settlement shall be fully explained to the first party claimant.” Ark. Ins. R. 43, § 10(a)(3).

18. CCC One Information Services, Inc. is not a qualified dealer or appraisal service located in Pulaski County, Arkansas.

19. Allstate did not provide any documentation to DuPriest or Gilmore about why it needed to deviate from one of the two approved methods of determining actual cash value for their vehicles. Moreover, the CCC One Report specifically disclaims that its adjustments are measurable, discernable, or appropriate, proclaiming that the adjustments “**are displayed for illustrative purposes only.**” See Gilmore CCC One Report, Exhibit 2, p. 3. Allstate does not explain these deductions to the customer, much less show that they are reasonable and appropriate.

20. There was nothing unique about Plaintiffs’ vehicles that would justify deviating from the methods approved under Arkansas law. Allstate

was required to adjust DuPriest's and Gilmore's vehicles using one of the two approved methods.

21. Allstate knows or should know that using the CCC One Report to determine actual cash value violates Arkansas law. Despite knowing that the practice is unlawful, Allstate uses the practices because it saves Allstate millions of dollars. Allstate can achieve this savings because the cost of obtaining an appraisal and litigating the value of a property damage claim exceeds the difference in value between the CCC One Report and the actual cash value of the vehicle.

IV. CLASS ACTION ALLEGATIONS

22. Plaintiffs incorporate by reference the preceding paragraphs as if they were fully set forth herein.

23. Plaintiffs bring this as a class action under Rule 23 of the *Arkansas Rules of Civil Procedure*.

24. Members of the putative class are so numerous that joinder of all such members is impracticable. The exact size of the putative class is unknown, but may be easily determined from records maintained by Allstate.

25. There are common questions of law and fact applicable to the putative class with respect to liability, relief, and anticipated affirmative defenses. Common questions of law and fact include:

- a. Whether Allstate has a practice of using the CCC One Report to determine actual cash value;
- b. Whether Regulation § 43, § 10 is incorporated into the terms of Allstate's automobile insurance policies;
- c. Whether Allstate's practices violated Regulation 43, § 10; and
- d. Whether CCC One Information Services, Inc. is a qualified dealer or appraiser in the local market area.

26. Plaintiffs' claims are typical of the putative class. Like all other putative class members, Plaintiffs had total loss automobile claims that were settled and adjusted using the CCC One Report.

27. Plaintiffs will fairly and adequately protect the interest of the putative class. They have no conflicts with putative class members and have suffered the same injury as members of the putative class.

28. Plaintiffs' counsel possesses the requisite resources and experience in class action litigation to adequately represent Plaintiffs in prosecuting the claims here.

29. The questions of law and fact common to Plaintiffs and members of the putative class predominate over any question affecting only individual class members. These common questions concerning Allstate's wrongdoing must be resolved for all class members.

30. A class action is superior to other available methods for the fair and efficient adjudication of this controversy. Allstate engages in a common business practice of using the CCC One Report to settle total loss claims, which is alleged to violate Arkansas law, and it is not unfair to require Allstate to litigate its business practice on a class-wide basis. Moreover, Class members' individual damage claims are too small to make individual litigation an economically viable alternative. But despite the small size of any one individual's claims standing along, the aggregate value of the practice is substantial.

31. Plaintiffs' class claims are appropriate to proceed under the Arkansas Deceptive Trade Practices Act. Act 986 of 2017 – which purports to prohibit most private class actions under the Act – is an unconstitutional

intrusion into the Arkansas Supreme Court's exclusive authority to "prescribe the rules of pleading, practice and procedure for all courts." Ark. Const. Amend. 80, § 3; *see also Johnson v. Rockwell Automation*, 2009 Ark. 241, 308 S.W.3d 135 (holding two provisions of Arkansas Civil Justice Reform Act were unconstitutional); *Summerville v. Thrower*, 369 Ark. 231, 253 S.W.3d 415 (2007) (holding statute requiring reasonable cause affidavit was unconstitutional); *Weidrick v. Arnold*, 310 Ark. 138, 835 S.W.2d 843 (1992) (holding statute requiring 60-day notice before filing medical malpractice claim was unconstitutional).

V. CAUSES OF ACTION

COUNT I: ARKANSAS DECEPTIVE TRADE PRACTICES ACT

32. Plaintiffs incorporate by reference the preceding paragraphs as if they were fully set forth herein.

33. Arkansas law requires that an insurer settle total loss automobile claims by providing the insured with enough money to purchase a specific comparable replacement vehicle in the local market area, or, if no comparable vehicle is available, using one of two or more quotations from a local dealer or appraiser. Ark. Ins. R. 43, § 10.

34. Allstate settles total loss automobile claims by relying on the CCC One Report, CCC One Information Services, Inc. is not a local dealer or appraiser and even though the report does not provide the insured with sufficient funds to purchase a comparable replacement automobile.

35. Allstate engaged in an unconscionable, false, or deceptive act or practice in business, commerce, or trade when it used the CCC One Report to settle Plaintiffs' total loss claims. Allstate also used the same unconscionable, false, or deceptive act or practice in using the CCC One Report to settle all of its total loss claims in Arkansas.

36. Defendant's conduct proximately caused damage to Plaintiffs and putative class members. Plaintiffs and putative class members seek compensatory damages in an amount equal to the difference between the amount paid to them to settle total loss claims and the actual cash value of their vehicle computed as required by Arkansas law.

37. Allstate knew or ought to have known that their conduct would result in injury to Plaintiffs and putative class members and it continued in such conduct in reckless disregard of the consequences. As a result, Plaintiffs and putative class members are entitled to punitive damages.

38. Plaintiffs and the putative class members are entitled to an award of attorneys' fees, costs, and expenses in bringing their Deceptive Trade Practices Act claims.

COUNT II: FRAUD IN THE INDUCEMENT

39. Plaintiffs incorporate by reference the preceding paragraphs as if they were fully set forth herein.

40. Allstate falsely represented that the amount in the CCC One Report represented the actual cash value of Plaintiffs' vehicles. Allstate made the same false representation to every other putative class member.

41. Allstate knew that its representation was false. First, Allstate knew that Arkansas law requires that an insurer use one of the methods identified in Regulation 43 to determine actual cash value and that the CCC One Report was not a permissible method. Further, Allstate knew that the CCC One Report systematically generated valuations that were lower than the "actual cash value" that would have resulted had it obtained a valuation from a qualified local dealer or appraiser as required by Arkansas law.

42. Allstate intended to induce and coerce Plaintiffs and putative class members into settling their total loss claims for less than they would

have if Allstate had complied with Arkansas law and obtained a quotation from a qualified dealer or appraiser located in the local market area.

43. Plaintiffs and putative class members justifiably relied on Allstate's representation about the actual cash value. Indeed, because the misrepresentation goes to a material matter, reliance is presumed. *Manhattan Credit Co. v. Burns*, 230 Ark. 418, 323 S.W.2d 206 (1959) ("[R]eliance is to be presumed when, as here, the misrepresentation goes to a material matter."); *Pickering v. Garrison*, 2009 Ark. App. 107, at *13 ("Reliance is presumed when the misrepresentation goes to a material matter.").

44. Allstate's conduct proximately caused damages. Plaintiffs and putative class members suffered damages in an amount equal to the difference between the amount paid to them to settle their total loss claims and the actual cash value of their vehicle computed as required by Arkansas law.

45. Defendant knew or ought to have known that its conduct would result in injury to Plaintiffs and putative class members and it continued in such conduct in reckless disregard of the consequences. As a result, Plaintiffs and putative class members are entitled to punitive damages.

COUNT III: BAD FAITH

46. Plaintiffs incorporate by reference the preceding paragraphs as if they were fully set forth herein.

47. Allstate acted in bad faith to avoid liability under its policy issued to Plaintiffs. Allstate knew that its method of settling total loss claims violated Arkansas law and would result in a lower payment to Plaintiffs than if Allstate would have obtained a quotation from a qualified local dealer or appraiser. Despite this knowledge, Allstate fraudulently presented the CCC One Report to Plaintiffs as representing the “actual cash value” of their vehicles.

48. Allstate did more than merely refuse to pay a claim. Allstate intentionally violated Arkansas law to save itself money at the expense of its insured. Allstate’s conduct was dishonest and oppressive, and was carried out with a state of mind characterized by contempt for its insureds.

49. Allstate’s conduct proximately caused damages. Plaintiffs and putative class members suffered damages in an amount equal to the difference between the amount paid to them to settle total loss claims and the actual cash value of their vehicle computed as required by Arkansas law.

50. Defendants knew or ought to have known that their conduct would result in injury to Plaintiffs and putative class members and it continued in such conduct in reckless disregard of the consequences. As a result, Plaintiffs and putative class members are entitled to punitive damages.

COUNT IV: BREACH OF CONTRACT

51. Plaintiffs incorporate by reference the preceding paragraphs as if they were fully set forth herein.

52. Allstate entered separately into contracts with Plaintiffs DuPriest and Gilmore. Among other things, these policies provide for the adjustment and settlement of total losses based on “actual cash value or replacement with another of like kind or quality.”

53. Arkansas law requires that Allstate either provide a replacement vehicle, provide a cash settlement based on a specific replacement vehicle if one is available in the local market area, or use “one (1) of two (2) or more quotations obtained by the insurer from two (2) or more qualified dealers or appraisal services located within the local market area when a comparable automobile is located in the local market area.” Ark. Ins. Regulation 43, § 10(a)(2). If the insurer deviates from this method, it must provide

documentation for the deviation, including giving particulars of the automobiles condition, and “[a]ny deductions from such cost, including deduction for salvage, must be measurable, discernable, itemized, and specified as to dollar amount and shall be appropriate in amount.” Ark. Ins. R. 43, § 10(a)(3). Further, “[t]he basis for such settlement shall be fully explained to the first party claimant.” Ark. Ins. R. 43, § 10(a)(3). The provisions of Ark. Ins. R. 43 are incorporated into the insurance contract as a matter of law. *See First Sec. Bank v. John Doe 1, 2, & 3*, 297 Ark. 254, 257, 760 S.W.2d 863, 865 (1988).

54. Plaintiffs and putative class members did what the contract required of them.

55. Allstate breached the contracts by using the CCC One Report instead of using the methods required by Arkansas law.

56. As a result of Allstate’s breach of contract, Plaintiffs and putative class members suffered damages in an amount equal to the difference between the amount paid to them to settle total loss claims and the actual cash value of their vehicle computed as required by Arkansas law.

VI. JURY DEMAND & PRAYER FOR RELIEF

57. Plaintiffs incorporate by reference the preceding paragraphs as if they were fully set forth herein.

58. Article 2, § 7 of the Arkansas Constitution provides that “The right of trial by jury shall remain inviolate, and shall extend to all cases at law, without regard to the amount in controversy[.]” Further, Article 2, § 13 also guarantees every person a “remedy in the laws for all injuries or wrongs....” Plaintiffs demand a remedy in the laws for all injuries and wrongs alleged, and a trial by jury on all issues so triable.

59. WHEREFORE, Plaintiffs respectfully requests this Court:

a. Certify a class defined as:

All individuals insured by Allstate under a policy issued or effective in Arkansas who: (a) had a total loss claim with Allstate; (b) that received a settlement calculated using CCC One Report; (c) during the period from February 28, 2014 to the present.

b. Appoint Jeffrey DuPriest and Rachel Gilmore as class representatives;

c. Appoint Holleman & Associates, P.A. as class counsel;

d. Declare that Allstate's practice of using the CCC One Report to settle total loss claims violates Arkansas law;

e. Enjoin Allstate from using the CCC One Report to settle future total loss claims in the state of Arkansas;

f. Award them compensatory damages in an amount equal to the difference between the actual cash value of their vehicles and the amount Allstate paid;

g. Award them punitive damages in an amount sufficient to punish Allstate for its wrongdoing and to deter others from engaging in similar wrongdoing;

h. Award Plaintiffs all recoverable costs, expenses, and attorneys' fees incurred in prosecuting this action, together with all applicable interest; and

i. Grant Plaintiffs all such further relief deemed just and appropriate.

Respectfully Submitted,

HOLLEMAN & ASSOCIATES, P.A.
1008 West Second Street
Little Rock, Arkansas 72201
Tel. 501.975.5040
Fax 501.975.5043



By: _____

John Holleman, ABN 91056

jholleman@johnholleman.net

Timothy A. Steadman, ABN 2009113

tim@johnholleman.net

Jerry Garner, ABN 2014134

jerry@johnholleman.net

&

Lloyd "Tre" Kitchens, ABN 99075

tkitchens@bradhendricks.com

THE BRAD HENDRICKS LAW FIRM

500 C Pleasant Valley Drive

Little Rock, AR 72227

Telephone (501) 221-0444

ELECTRONICALLY FILED
Pulaski County Circuit Court
Terri Hollingsworth, Circuit/County Clerk

CCC ONE MARKET VALUATION REPORT

000D12-111 Pages

Prepared for ALLSTATE



REPORT SUMMARY



CLAIM INFORMATION

Owner	Jeffrey Dupriest 6217 Blackhawk Dr, North Little Rock, AR 72116
Loss Unit	Cruiser 2003 Honda VTX1800C3 1795
Loss Unit Type	MOTORCYCLES
Loss Incident Date	10/06/2016
Claim Reported	10/11/2016



INSURANCE INFORMATION

Report Reference Number	82434098 -2
Claim Reference	000431338946D01
Adjuster	Mobarak, Geoffrey
Odometer	34,400
Last Updated	10/11/2016 01:13 PM



VALUATION SUMMARY

Base Value	\$ 3,657.00
Adjusted Value	\$ 3,657.00
DMV	+ \$ 13.75
Deductible	- \$ 250.00

Total \$3,420.75

The total may not represent the total of the settlement as other factors (e.g. license and fees) may need to be taken into account.

The CCC ONE® Market Valuation Report reflects CCC Information Services Inc.'s opinion as to the value of the loss unit, based on information provided to CCC by ALLSTATE.

BASE VALUE

This is derived from comparable unit(s) available or recently available in the marketplace at the time of valuation, per our valuation methodology described on the next page.

Inside the Report

Valuation Methodology	2
Loss Unit Information	3
Comparable Units	4
Valuation Notes	6
Supplemental Information	7

EXHIBIT

1

CCC ONE. MARKET VALUATION REPORT

Owner: Jeffrey Dupriest
Claim: 000431338946D01

VALUATION METHODOLOGY

How was the valuation determined?

CLAIM INSPECTION



ALLSTATE has provided CCC with the zip code where the loss unit is garaged, loss unit VIN, mileage/hours, options and additional equipment, as well as loss unit condition, which is used to assist in determining the value of the loss unit.

DATABASE REVIEW



CCC maintains an extensive database of units that currently are or recently were available for sale in the U.S. This database includes units advertised for sale by dealerships or private parties. All of these sources are updated regularly.

SEARCH FOR COMPARABLES

When a valuation is created the database is searched and comparable units are selected. On current year units, new units for sale at the time of the valuation may have been used. The zip code where the loss unit is garaged determines the starting point for the search. Comparable units are similar to the loss unit based on relevant factors. If a sufficient number of comparable units cannot be located, CCC may also obtain dealer quotations for a unit with attributes as reported by the insurer.



CALCULATE VALUATION

Adjustments to the price of the selected comparable units are made to reflect differences in attributes, including mileage/hours, options, additional equipment, refurbishments, after factory equipment, and condition. Dollar adjustments are based upon market research. Finally, the Base Value is the straight average of the adjusted values of the comparable units. Due to the unique nature of the loss units valued in the Commercial and Recreational Vehicle division, a valuation specialist handles each request individually.



CCC ONE MARKET VALUATION REPORT

Owner: Jeffrey Dupriest
Claim: 000431338946D01



LOSS UNIT INFORMATION

LOSS UNIT DETAILS

Location	North Little Rock, AR 72116
VIN	1HFSC460X3A110962
Year	2003
Make	Honda
Model	VTX1800C3
Engine Description	1795
Model #	1HFSC4603A

LOSS UNIT CONDITION

	Condition
Overall Rating	Average

LOSS UNIT EQUIPMENT

Wheels	Performance Tires	✓
--------	-------------------	---

Motorcycles sold in the United States are required to have a manufacturer assigned Vehicle Identification Number (VIN). This number provides certain specifications of the motorcycle. Please review the information in the Loss Unit Information Section to confirm the reported mileage and condition and to verify that the information accurately reflects the options, additional equipment, refurbishments or other aspects of the loss unit that may impact the value.

ALLSTATE uses condition inspection guidelines to determine the condition of the loss unit prior to the loss. The guidelines describe physical characteristics for the loss unit, for the condition selected based upon age. Inspection Notes reflect observations from the appraiser regarding the loss unit's condition.

To the left is the equipment of the loss unit that ALLSTATE provided to CCC.

CCC ONE MARKET VALUATION REPORT

Owner: Jeffrey Dupriest
Claim: 000431338946D01

COMPARABLE UNITS

	Loss Unit	Comp 1	Comp 2	Comp 3
Price		\$4,290	\$3,000	\$4,399
Year/Make/Model	2003 Honda VTX1800C3	2003 Honda VTX1800C3	2003 Honda VTX1800C3	2003 Honda VTX1800S
Odometer	34,400	17,254	70,151	30,000
Configuration				
Engine	1795	1795CC	1795CC	1795
Options				
Luggage/Roof Rack	x	x	x	✓
Engine Guard	x	x	x	✓
Stereo	x	x	x	✓
Back Rest	x	✓	✓	✓
Performance Tires	✓	✓	✓	✓
FM Radio	x	x	x	✓
Plexiglass Fairing	x	x	✓	x
Fairing	x	x	x	✓
Forward Controls	x	x	x	✓
AM Radio	x	x	x	✓
Floor Boards/Highway Boards	x	x	x	✓
Soft Saddle Bags	x	x	✓	✓
Condition	Average	Average	Average	Average
Adjustments:				
Make/Model/Trim				-\$ 810
Options				
Luggage/Roof Rack				-\$ 33
Engine Guard				-\$ 33
Stereo				-\$ 63
Back Rest		-\$ 36	-\$ 36	-\$ 36
Plexiglass Fairing			-\$ 36	
Forward Controls				-\$ 58
Floor Boards/Highway Boards				-\$ 42
Soft Saddle Bags			-\$ 50	-\$ 50
Odometer		-\$ 395	\$ 626	-\$ 83

Comp 1 Updated Date: 05/03/2016
2003 Honda VTX1800C3
VIN: UNKNOWN
Dealership SUNRISE HONDA
MOTORSPORTS
Telephone (866) 476-9995
Source Dealer Ad
Location Searcy, AR

Comp 2 Updated Date: 06/03/2016
2003 Honda VTX1800C3
VIN: UNKNOWN
Contact JARRETT DORSEY
Telephone (903) 812-0736
Source Private Seller
Location Kilgore, TX

Comp 3 Updated Date: 09/20/2016
2003 Honda VTX1800S
VIN 1HFSC493X3A102737
Dealership MOTOR SPORTS OF
MUSK
Telephone (866) 542-3540
Source Dealer Ad
Stock # 102737
Location Muskogee, OK

Comparables used in the determination of the Base Value are not intended to be replacement units but are reflective of the market value, and may no longer be available for sale.

Price is the amount that the dealership will accept to sell the unit, though a lower price may be obtainable through negotiation.

Adjusted Comparable Value \$3,859 \$3,504 \$3,191

CCC ONE MARKET VALUATION REPORT

Owner: Jeffrey Dupriest
Claim: 000431338946D01

COMPARABLE UNITS

	Loss Unit	Comp 4	Comp 5
Price		\$3,995	\$4,300
Year/Make/Model	2003 Honda VTX1800C3	2003 Honda VTX1800C3	2003 Honda VTX1800C3
Odometer	34,400	40,000	19,000
Configuration			
Engine	1795	1795CC	1795CC
Options			
Light Bar - Custom Lights	x	x	✓
Custom Seating	x	x	✓
Forward Controls	x	✓	x
Luggage/Roof Rack	x	✓	x
Back Rest	x	✓	✓
Performance Tires	✓	✓	✓
Plexiglass Fairing	x	✓	✓
Soft Saddle Bags	x	✓	x
Condition	Average	Average	Average

Adjustments:

Options

Custom Seating		- \$ 48
Forward Controls	- \$ 58	
Luggage/Roof Rack	- \$ 33	
Back Rest	- \$ 36	- \$ 36
Plexiglass Fairing	- \$ 36	- \$ 36
Soft Saddle Bags	- \$ 50	
Odometer	\$ 98	- \$ 331

Comp 4 Updated Date: 05/03/2016
2003 Honda VTX1800C3
VIN UNKNOWN
Dealership HONDA OF NORTH LITTLE ROCK
Telephone (866) 473-1990
Source Dealer Ad
Location North Little Rock, AR
Comp 5 Updated Date: 06/03/2016
2003 Honda VTX1800C3
VIN UNKNOWN
Telephone (501) 944-1136
Source Private Seller
Location Little Rock, AR

Comparables used in the determination of the Base Value are not intended to be replacement units but are reflective of the market value, and may no longer be available for sale.

Price is the amount that the dealership will accept to sell the unit, though a lower price may be obtainable through negotiation.

Adjusted Comparable Value **\$3,880** **\$3,849**

CCC ONE MARKET VALUATION REPORT

Owner: Jeffrey Dupriest
Claim: 000431338946D01



VALUATION NOTES

10/10/2016 13:11 - Loss Vehicle Average Mileage: 25,105

10/10/2016 13:11 - Standard equipment: PE

The following information was provided after the valuation was completed

10/11/2016 13:13 - Sales Tax data modified after Valuation

10/11/2016 13:13 - Pre/Post Tax data modified after Valuation

10/11/2016 13:13 - PVADJ CHANGE REQUESTED BY: MOBARAK, GEOFFREY

This Market Valuation Report has been prepared exclusively for use by ALLSTATE, and no other person or entity is entitled to or should rely upon this Market Valuation Report and/or any of its contents. CCC is one source of valuations, and there are other valuation sources available.



CCC ONE. MARKET VALUATION REPORT

SUPPLEMENTAL INFORMATION

Owner: Jeffrey Dupriest
Claim: 000431338946D01



LOSS UNIT HISTORY SUMMARY

Experian AutoCheck No Title Problem Found



LOSS UNIT HISTORY INFORMATION

VINGuard®

VINGuard® Message: VINGuard has decoded this VIN without any errors



CCC ONE. MARKET VALUATION REPORT

Owner: Jeffrey Dupriest
Claim: 000431338946D01

SUPPLEMENTAL INFORMATION

CCC ONE. MARKET VALUATION REPORT

Owner: Jeffrey Dupriest
Claim: 000431338946D01

SUPPLEMENTAL INFORMATION



EXPERIAN® AUTOCHECK® VEHICLE HISTORY REPORT

CCC provides ALLSTATE information reported by Experian® regarding the 2003 Honda VTX1800C3, 1795 (1HFSC460X3A110962). This data is provided for informational purposes.

Unless otherwise noted in this Market Valuation Report, CCC does not adjust the value of the loss unit based upon this information.

LEGEND

- ✓ No Event Found
- ⊖ Event Found
- ⊞ Information Needed

TITLE CHECK

THIS VEHICLE CHECKS OUT

AutoCheck's result for this loss unit show no significant title events. When found, events often indicate automotive damage or warnings associated with the unit.

EVENT CHECK

THIS VEHICLE CHECKS OUT

AutoCheck's result for this loss unit show no historical events that indicate a significant automotive problem. These problems can indicate past previous car damage, theft, or other significant problems.

VEHICLE INFORMATION

THIS VEHICLE CHECKS OUT

AutoCheck's result for this loss unit show no vehicle information that indicate a significant automotive problem. These problems can indicate past previous car damage, theft, or other significant problems.

ODOMETER CHECK

THIS VEHICLE CHECKS OUT

AutoCheck's result for this loss unit show no indication of odometer rollback or tampering was found. AutoCheck determines odometer rollbacks by searching for records that indicate odometer readings less than a previously reported value. Other odometer events can report events of tampering, or possible odometer breakage.

TITLE CHECK

RESULTS FOUND

Abandoned	✓ No Abandoned Record Found
Damaged	✓ No Damaged Record Found
Fire Damage	✓ No Fire Damage Record Found
Grey Market	✓ No Grey Market Record Found
Hail Damage	✓ No Hail Damage Record Found
Insurance Loss	✓ No Insurance Loss Record Found
Junk	✓ No Junk Record Found
Rebuilt	✓ No Rebuilt Record Found
Salvage	✓ No Salvage Record Found

EVENT CHECK

RESULTS FOUND

NHTSA Crash Test Vehicle	✓ No NHTSA Crash Test Vehicle Record Found
Frame Damage	✓ No Frame Damage Record Found
Major Damage Incident	✓ No Major Damage Incident Record Found
Manufacturer Buyback/Lemon	✓ No Manufacturer Buyback/Lemon Record Found
Odometer Problem	✓ No Odometer Problem Record Found
Recycled	✓ No Recycled Record Found
Branded Title Auction	✓ No Branded Title Auction Record Found
Water Damage	✓ No Water Damage Record Found

VEHICLE INFORMATION

RESULTS FOUND

Accident	✓ No Accident Record Found
Corrected Title	✓ No Corrected Title Record Found
Driver Education	✓ No Driver Education Record Found
Duplicate Title	✓ No Duplicate Title Record Found
Emissions Safety Inspection	✓ No Emissions Safety Inspection Record Found
Fire Damage Incident	✓ No Fire Damage Incident Record Found
Lease	✓ No Lease Record Found
Lien	✓ No Lien Record Found
Livery Use	✓ No Livery Use Record Found
Government Use	✓ No Government Use Record Found
Police Use	✓ No Police Use Record Found
Fleet	✓ No Fleet Record Found
Rental	✓ No Rental Record Found
Fleet and/or Lease	✓ No Fleet and/or Lease Record Found
Fleet and/or Rental	✓ No Fleet and/or Rental Record Found
Repossessed	✓ No Repossessed Record Found
Taxi use	✓ No Taxi use Record Found
Theft	✓ No Theft Record Found

CCC ONE. MARKET VALUATION REPORTOwner: Jeffrey Dupriest
Claim: 000431338946D01**SUPPLEMENTAL INFORMATION****FULL HISTORY REPORT RUN DATE: 10/11/2016**

Below are the historical events for this vehicle listed in chronological order.

EVENT DATE	EVENT LOCATION	ODOMETER READING	DATA SOURCE	EVENT DETAIL
11/02/2005	CABOT, AR		Motor Vehicle Dept.	TITLE (Lien Reported)
03/17/2006	NORTH LITTLE ROCK, AR	694	Motor Vehicle Dept.	TITLE
04/02/2007	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
03/31/2008	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
03/31/2009	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
03/30/2010	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
03/31/2011	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
03/29/2012	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
03/28/2013	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
09/22/2014	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
03/30/2015	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
03/29/2016	NORTH LITTLE ROCK, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL

AUTOCHECK TERMS AND CONDITIONS:

Experian's Reports are compiled from multiple sources. It is not always possible for Experian to obtain complete discrepancy information on all vehicles; therefore, there may be other title brands, odometer readings or discrepancies that apply to a vehicle that are not reflected on that vehicle's Report. Experian searches data from additional sources where possible, but all discrepancies may not be reflected on the Report.

These Reports are based on information supplied to Experian by external sources believed to be reliable. BUT NO RESPONSIBILITY IS ASSUMED BY EXPERIAN OR ITS AGENTS FOR ERRORS, INACCURACIES OR OMISSIONS. THE REPORTS ARE PROVIDED STRICTLY ON AN "AS IS WHERE IS" BASIS, AND EXPERIAN FURTHER EXPRESSLY DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE REGARDING THIS REPORT.

YOU AGREE TO INDEMNIFY EXPERIAN FOR ANY CLAIMS OR LOSSES, INCLUDING COSTS, EXPENSES AND ATTORNEYS FEES, INCURRED BY EXPERIAN ARISING DIRECTLY OR INDIRECTLY FROM YOUR IMPROPER OR UNAUTHORIZED USE OF AUTOCHECK VEHICLE HISTORY REPORTS.

CCC ONE. MARKET VALUATION REPORT

Owner: Jeffrey Dupriest
Claim: 000431338946D01

SUPPLEMENTAL INFORMATION

Experian shall not be liable for any delay or failure to provide an accurate report if and to the extent which such delay or failure is caused by events beyond the reasonable control of Experian, including, without limitation, "acts of God", terrorism, or public enemies, labor disputes, equipment malfunctions, material or component shortages, supplier failures, embargoes, rationing, acts of local, state or national governments, or public agencies, utility or communication failures or delays, fire, earthquakes, flood, epidemics, riots and strikes.

These terms and the relationship between you and Experian shall be governed by the laws of the State of Illinois (USA) without regard to its conflict of law provisions. You and Experian agree to submit to the personal and exclusive jurisdiction of the courts located within the county of Cook, Illinois.

**MARKET VALUATION REPORT**

C00D127-151 Pages 1

Prepared for ALLSTATE INSURANCE COMPANY

**REPORT SUMMARY****CLAIM INFORMATION**

Owner	Gilmore, Rachel 819 E Martin St Apt 1 Jacksonville, AR 72076-3489
Loss Vehicle	2005 Toyota Corolla S Automatic
Loss Incident Date	11/16/2016
Claim Reported	11/21/2016

The CCC ONE® Market Valuation Report reflects CCC Information Services Inc.'s opinion as to the value of the loss vehicle, based on information provided to CCC by ALLSTATE INSURANCE COMPANY.

Loss vehicle has 5% greater than average mileage of 138,400.

**INSURANCE INFORMATION**

Report Reference Number	82892073 -1
Claim Reference	000436361489D01
Adjuster	Ward, Cade
Odometer	144,987
Last Updated	11/21/2016 08:39 AM

**VALUATION SUMMARY**

Base Vehicle Value	\$ 5,238.00
Adjusted Vehicle Value	\$ 5,238.00
Vehicular Tax (7.9318%)	+ \$ 415.47
Tax reflects applicable state, county and municipal taxes.	
DMV Fee	+ \$ 13.75
Value before Deductible	\$ 5,667.22
Deductible	- \$ 500.00
Total	\$ 5,167.22

The total may not represent the total of the settlement as other factors (e.g. license and fees) may need to be taken into account.

BASE VEHICLE VALUE

This is derived from comparable vehicle(s) available or recently available in the marketplace at the time of valuation, per our valuation methodology described on the next page.

ADJUSTED VEHICLE VALUE

This is determined by adjusting the Base Vehicle Value to account for the actual condition of the loss vehicle and certain other reported attributes, if any, such as refurbishments and after factory equipment.

Inside the Report

Valuation Methodology.....	2
Vehicle Information.....	3
Vehicle Condition.....	6
Comparable Vehicles.....	7
Valuation Notes.....	10
Supplemental Information.....	11

EXHIBIT**2**

CCC ONE. MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01

VALUATION METHODOLOGY

How was the valuation determined?

CLAIM INSPECTION



ALLSTATE INSURANCE COMPANY has provided CCC with the zip code where the loss vehicle is garaged, loss vehicle VIN, mileage, equipment, as well as loss vehicle condition, which is used to assist in determining the value of the loss vehicle.

DATABASE REVIEW



CCC maintains an extensive database of vehicles that currently are or recently were available for sale in the U.S. This database includes vehicles that CCC employees have physically inspected, as well as vehicles advertised for sale by dealerships or private parties. All of these sources are updated regularly.

SEARCH FOR COMPARABLES

When a valuation is created the database is searched and comparable vehicles in the area are selected. The zip code where the loss vehicle is garaged determines the starting point for the search. Comparable vehicles are similar to the loss vehicle based on relevant factors.



CALCULATE BASE VEHICLE VALUE

Adjustments to the price of the selected comparable vehicles are made to reflect differences in vehicle attributes, including mileage and options. Dollar adjustments are based upon market research.

Finally, the Base Vehicle Value is the weighted average of the adjusted values of the comparable vehicles based on the following factors:

- Source of the data (such as inspected versus advertised)
- Similarity (such as equipment, mileage, and year)
- Proximity to the loss vehicle's primary garage location
- Recency of information



CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01



VEHICLE INFORMATION

VEHICLE DETAILS

Location	JACKSONVILLE, AR 72076-3489
VIN	1NXBR32E05Z412035
Year	2005
Make	Toyota
Model	Corolla
Trim	S
Body Style	Automatic
Body Type	Sedan
Engine -	
Cylinders	4
Displacement	1.8L
Fuel Type	Gasoline
Carburation	SEFI
Transmission	Automatic Transmission Overdrive
Curb Weight	2550 lbs

Vehicles sold in the United States are required to have a manufacturer assigned Vehicle Identification Number(VIN). This number provides certain specifications of the vehicle.

Please review the information in the Vehicle Information Section to confirm the reported mileage and to verify that the information accurately reflects the options, additional equipment or other aspects of the loss vehicle that may impact the value.

VEHICLE ALLOWANCES

Odometer	144,987	- 194
Options		
Cruise Control	Reported	+ 47
Aluminum/Alloy Wheels	Reported	+ 94
Alarm	Reported	+ 70

Reported* Option(s) added after initial valuation

Allowances are factors influencing the value of the loss vehicle when compared to a typical vehicle. The typical vehicle is a vehicle of the same year, make, and model as the loss vehicle, including average mileage, and all standard and predominant equipment. These allowances are displayed for illustrative purposes only.

The Base Vehicle Value is calculated from the comparable vehicles with adjustments to reflect the loss vehicle configuration

VEHICLE HISTORY SUMMARY

Experian AutoCheck	No Title Problem Found
Insurance Services Organization/ National Insurance Crime Bureau	1 Record Found
National Highway Traffic Safety Administration	2 Recalls

CCC ONE. MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01



VEHICLE INFORMATION

VEHICLE EQUIPMENT

Odometer	144,987	
Transmission	Automatic Transmission	✓
	Overdrive	✓
Power	Power Steering	✓
	Power Brakes	✓
	Power Windows	☐
	Power Locks	✓
	Power Mirrors	✓
	Power Trunk/Gate Release	✓
Decor/Convenience	Air Conditioning	✓
	Climate Control	☐
	Tilt Wheel	✓
	Cruise Control	☐
	Rear Defogger	✓
	Intermittent Wipers	✓
	Console/Storage	✓
Seating	Cloth Seats	✓
	Bucket Seats	✓
	Reclining/Lounge Seats	☐
Radio	AM Radio	✓
	FM Radio	✓
	Stereo	✓
	Search/Seek	✓
	CD Player	✓
Wheels	Aluminum/Alloy Wheels	☐
Safety/Brakes	Air Bag (Driver Only)	✓
	Passenger Air Bag	✓
	Alarm	☐
Exterior/Paint/Glass	Dual Mirrors	✓
	Body Side Moldings	✓
	Tinted Glass	✓
	Fog Lamps	✓

To the left is the equipment of the loss vehicle that ALLSTATE INSURANCE COMPANY provided to CCC.

✓ Standard This equipment is included in the base configuration of the vehicle at time of purchase.

☐ Additional Equipment that is not Standard but was noted to be on the loss vehicle.

CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01



VEHICLE INFORMATION

VEHICLE EQUIPMENT

Rear Spoiler



Clearcoat Paint



Other - Cars

California Emissions



CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01



VEHICLE CONDITION

COMPONENT CONDITION

	Condition	Inspection Notes	Value Impact
INTERIOR			
Seats	PRIVATE OWNER	lightly soiled, moderate wear in drivers area with a few burn holes	\$ 0
Carpets	PRIVATE OWNER	lightly soiled with a few burn marks, lightly worn in drivers area	\$ 0
Dashboard	PRIVATE OWNER	console lid broken, storage lid broken, few light scratches and gouges	\$ 0
Headliner	PRIVATE OWNER	lightly scuffed with 2 burn marks	\$ 0
EXTERIOR			
Sheet Metal	PRIVATE OWNER	few dents and dings, no rust, all panels properly aligned	\$ 0
Trim	PRIVATE OWNER	headlamps hazy, window trim cracked	\$ 0
Paint	PRIVATE OWNER	few rock chips and light scratches	\$ 0
Glass	PRIVATE OWNER	few small chips and scratches	\$ 0
MECHANICAL			
Engine	PRIVATE OWNER	belts and hoses firm with minimal wear, oil level normal on dipstick	\$ 0
Transmission	PRIVATE OWNER	fluid slightly discolored	\$ 0
TIRES			
Front Tires	PRIVATE OWNER	lt front 6/32, rt front 5/32, 5.5/32 average, based on new tread depth of 11/32, 5.5/11=50%	\$ 0
Rear Tires	PRIVATE OWNER	rt rear 5/32, lt rear 6/32, 5.5/32 average, based on new tread depth of 11/32, 5.5/11=50%	\$ 0

ALLSTATE INSURANCE COMPANY uses condition inspection guidelines to determine the condition of key components of the loss vehicle prior to the loss. The guidelines describe physical characteristics for these key components, for the condition selected based upon age. Inspection Notes reflect observations from the appraiser regarding the loss vehicle's condition.

CCC makes dollar adjustments that reflect the impact the reported condition has on the value of the loss vehicle as compared to Private Owner condition. These dollar adjustments are based upon interviews with dealerships across the United States.

Total Condition Adjustments \$ 0

CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01

COMPARABLE VEHICLES

Options	Loss Vehicle	Comp 1	Comp 2	Comp 3
Odometer	144,987	150,002	140,236	162,804
Automatic Transmission	✓	✓	✓	x
5 Speed Transmission	x	x	x	✓
Overdrive	✓	✓	✓	✓
Power Steering	✓	✓	✓	✓
Power Brakes	✓	✓	✓	✓
Power Windows	✓	x	✓	x
Power Locks	✓	✓	✓	✓
Power Mirrors	✓	✓	✓	✓
Power Trunk/Gate Release	✓	✓	✓	✓
Air Conditioning	✓	✓	✓	✓
Climate Control	✓	x	x	x
Tilt Wheel	✓	✓	✓	✓
Cruise Control	✓	x	x	x
Rear Defogger	✓	✓	✓	✓
Intermittent Wipers	✓	✓	✓	✓
Console/Storage	✓	✓	✓	✓
Keyless Entry	x	x	✓	x
Cloth Seats	✓	✓	✓	✓
Bucket Seats	✓	✓	✓	✓
Reclining/Lounge Seats	✓	x	x	x
AM Radio	✓	✓	✓	✓
FM Radio	✓	✓	✓	✓
Stereo	✓	✓	✓	✓
Search/Seek	✓	✓	✓	✓
CD Player	✓	✓	✓	✓
Wheel Covers	x	✓	✓	✓
Aluminum/Alloy Wheels	✓	x	x	x
Drivers Side Air Bag	✓	✓	✓	✓
Passenger Air Bag	✓	✓	✓	✓
Alarm	✓	x	x	x
Dual Mirrors	✓	✓	✓	✓
Body Side Moldings	✓	✓	✓	✓
Tinted Glass	✓	✓	✓	✓
Fog Lamps	✓	✓	✓	✓
Rear Spoiler	✓	✓	✓	✓
Clearcoat Paint	✓	x	x	x
California Emissions	✓	✓	✓	✓
List Price		\$ 4,981	\$ 6,691	\$ 6,488

Comp 1 Updated Date: 10/24/2016

2005 Toyota Corolla S Automatic 4

1.8l Gasoline Sefi

VIN 1NXBR32E15Z430267

Dealership North Point Toyota

Telephone (501) 753-0400

Source Autotrader

Stock # 5Z430267

Distance from Jacksonville, AR

8 Miles - North Little Rock, AR

Comp 2 Updated Date: 08/30/2016

2005 Toyota Corolla S Automatic 4

1.8l Gasoline Sefi

VIN 1NXBR32E15Z548366

Dealership North Point Toyota

Telephone (501) 753-0400

Source Autotrader

Stock # 5Z548366

Distance from Jacksonville, AR

8 Miles - North Little Rock, AR

Comp 3 Updated Date: 10/03/2016

2005 Toyota Corolla S Manual 4 1.8l

Gasoline Sefi

VIN 1NXBR32E35Z567498

Dealership Acura Of Memphis

Telephone (888) 993-7640

Source Autotrader

Stock # 6U2376A

Distance from Jacksonville, AR

129 Miles - Memphis, TN

Comparable vehicles used in the determination of the Base Vehicle Value are not intended to be replacement vehicles but are reflective of the market value, and may no longer be available for sale.

List Price is the sticker price of an inspected dealer vehicle and the advertised price for the advertised vehicle.

Distance is based upon a straight line between loss and comparable vehicle locations.

The Condition Adjustment sets that comparable vehicle to Private Owner condition, which the loss vehicle is also

CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01

COMPARABLE VEHICLES

Adjustments:

Make/Model/Trim			+ \$ 200
Options	+ \$ 258	+ \$ 141	+ \$ 258
Mileage	+ \$ 124	+ \$ 136	+ \$ 370
Condition ¹	- \$ 990	- \$ 990	- \$ 990

compared to in the Vehicle Condition section.

Adjusted Comparable Value: \$ 4,373 \$ 5,706 \$ 6,326

CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01

COMPARABLE VEHICLES

ADDITIONAL COMPARABLE VEHICLES

Source	Vehicle	Price	Adjusted Comparable Value
Comp 4			
Source: Autotrader	2006 Toyota Corolla S	\$ 5,981	\$ 5,393
Steve Landers Toyota Scio	Automatic 4 1.8l Gasoline	(List)	
Little Rock, AR	Sefl		
(855) 832-0847	Odometer: 166,597		
16 Miles From Jacksonville, AR	VIN: 1NXBR32E36Z691031		
	Stock #: 6Z691031		
	Updated Date: 11/01/2016		
Comp 5			
Source: Autotrader	2006 Toyota Corolla S	\$ 8,500	\$ 4,923
Wolfchase Toyota	Automatic 4 1.8l Gasoline	(List)	
Cordova, TN	Sefl		
(901) 377-8000	Odometer: 69,048		
134 Miles From Jacksonville, AR	VIN: 1NXBR32E56Z628464		
	Stock #: 6Z628464		
	Updated Date: 09/29/2016		

Additional Comparable Vehicles are in summary format, but are adjusted the same as those on the previous page.

Comparable vehicles used in the determination of the Base Vehicle Value are not intended to be replacement vehicles but are reflective of the market value, and may no longer be available for sale.

List Price is the sticker price of an inspected dealer vehicle and the advertised price for the advertised vehicle.

Distance is based upon a straight line between loss and comparable vehicle locations.

CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01



VALUATION NOTES

This Market Valuation Report has been prepared exclusively for use by ALLSTATE INSURANCE COMPANY; and no other person or entity is entitled to or should rely upon this Market Valuation Report and/or any of its contents. CCC is one source of vehicle valuations, and there are other valuation sources available.

Regulations concerning vehicle value include Arkansas Insurance Department Rule 43.

CCC ONE MARKET VALUATION REPORT

SUPPLEMENTAL INFORMATION

Owner: Gilmore, Rachel
Claim: 000436361489D01



VEHICLE HISTORY INFORMATION

VINGuard®

VINGuard® Message: VINGuard has decoded this VIN without any errors

ISO Vehicle History:

Number of times reported to ISO:	1
ISO's file number:	H0249305839
Loss date:	11/16/2016
Phone:	6153994825
Claim ref:	0436361489

CCC ONE. MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01

SUPPLEMENTAL INFORMATION



EXPERIAN® AUTOCHECK® VEHICLE HISTORY REPORT

CCC provides ALLSTATE INSURANCE COMPANY information reported by Experian regarding the 2005 Toyota Corolla (1NXBR32E05Z412035). This data is provided for informational purposes. Unless otherwise noted in this Valuation Detail, CCC does not adjust the value of the loss vehicle based upon this information.

LEGEND:

- ✓ No Event Found
- ⊖ Event Found
- ⊞ Information Needed

TITLE CHECK

THIS VEHICLE CHECKS OUT

AutoCheck's result for this loss vehicle show no significant title events. When found, events often indicate automotive damage or warnings associated with the vehicle.

EVENT CHECK

THIS VEHICLE CHECKS OUT

AutoCheck's result for this loss vehicle show no historical events that indicate a significant automotive problem. These problems can indicate past previous car damage, theft, or other significant problems.

VEHICLE INFORMATION

INFORMATION FOUND

AutoCheck found additional information on this vehicle. These records will provide more history for this loss vehicle

ODOMETER CHECK

THIS VEHICLE CHECKS OUT

AutoCheck's result for this loss vehicle show no indication of odometer rollback or tampering was found. AutoCheck determines odometer rollbacks by searching for records that indicate odometer readings less than a previously reported value. Other odometer events can report events of tampering, or possible odometer breakage.

TITLE CHECK

TITLE CHECK	RESULTS FOUND
Abandoned	✓ No Abandoned Record Found
Damaged	✓ No Damaged Record Found
Fire Damage	✓ No Fire Damage Record Found
Grey Market	✓ No Grey Market Record Found
Hail Damage	✓ No Hail Damage Record Found
Insurance Loss	✓ No Insurance Loss Record Found
Junk	✓ No Junk Record Found
Rebuilt	✓ No Rebuilt Record Found
Salvage	✓ No Salvage Record Found

EVENT CHECK

EVENT CHECK	RESULTS FOUND
NHTSA Crash Test Vehicle	✓ No NHTSA Crash Test Vehicle Record Found
Frame Damage	✓ No Frame Damage Record Found
Major Damage Incident	✓ No Major Damage Incident Record Found
Manufacturer Buyback/Lemon	✓ No Manufacturer Buyback/Lemon Record Found
Odometer Problem	✓ No Odometer Problem Record Found
Recycled	✓ No Recycled Record Found
Water Damage	✓ No Water Damage Record Found
Salvage Auction	✓ No Salvage Auction Record Found

VEHICLE INFORMATION

VEHICLE INFORMATION	RESULTS FOUND
Accident	✓ No Accident Record Found
Corrected Title	⊞ Corrected Title Record Found
Driver Education	✓ No Driver Education Record Found
Fire Damage Incident	✓ No Fire Damage Incident Record Found
Lease	⊞ Lease Record Found
Lien	✓ No Lien Record Found
Livery Use	✓ No Livery Use Record Found
Government Use	✓ No Government Use Record Found
Police Use	✓ No Police Use Record Found
Fleet	✓ No Fleet Record Found
Rental	✓ No Rental Record Found
Fleet and/or Rental	✓ No Fleet and/or Rental Record Found
Repossessed	✓ No Repossessed Record Found
Taxi use	✓ No Taxi use Record Found
Theft	✓ No Theft Record Found
Fleet and/or Lease	⊞ Fleet and/or Lease Record Found
Emissions Safety Inspection	✓ No Emissions Safety Inspection Record Found
Duplicate Title	✓ No Duplicate Title Record Found

CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01

SUPPLEMENTAL INFORMATION



FULL HISTORY REPORT RUN DATE: 11/21/2016

Below are the historical events for this vehicle listed in chronological order.

EVENT DATE	RESULTS FOUND	ODOMETER READING	DATA SOURCE	EVENT DETAIL
09/13/2004	AR		Independent Source	VEHICLE MANUFACTURED AND SHIPPED TO DEALER
04/21/2005	MONTICELLO, AR	11	Motor Vehicle Dept.	TITLE (Lien Reported)
05/23/2005	MONTICELLO, AR		Motor Vehicle Dept.	TITLE (Lien Reported)
05/23/2005	MONTICELLO, AR		Motor Vehicle Dept.	CORRECTED TITLE
09/19/2005	MONTICELLO, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
09/29/2006	MONTICELLO, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
01/30/2007	TX	60422	Auto Auction	REPORTED AT AUTO AUCTION
02/22/2007	TX	60422	Auto Auction	AUCTION ANNOUNCED AS FLEET/LEASE
06/05/2007	DOVER, AR	60484	Motor Vehicle Dept.	TITLE (Lien Reported)
06/05/2007	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
09/26/2008	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
09/15/2009	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
07/23/2010	DOVER, AR	131252	Motor Vehicle Dept.	TITLE
07/23/2010	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
07/22/2011	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
07/17/2012	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
07/05/2013	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
07/14/2014	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
07/09/2015	DOVER, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
09/23/2015	JACKSONVILLE, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL
07/12/2016	JACKSONVILLE, AR		Motor Vehicle Dept.	REGISTRATION EVENT/ RENEWAL

AUTOCHECK TERMS AND CONDITIONS:

CCC ONE MARKET VALUATION REPORT

Owner: Gilmore, Rachel
Claim: 000436361489D01

SUPPLEMENTAL INFORMATION

Experian's Reports are compiled from multiple sources. It is not always possible for Experian to obtain complete discrepancy information on all vehicles; therefore, there may be other title brands, odometer readings or discrepancies that apply to a vehicle that are not reflected on that vehicle's Report. Experian searches data from additional sources where possible, but all discrepancies may not be reflected on the Report.

These Reports are based on information supplied to Experian by external sources believed to be reliable, BUT NO RESPONSIBILITY IS ASSUMED BY EXPERIAN OR ITS AGENTS FOR ERRORS, INACCURACIES OR OMISSIONS. THE REPORTS ARE PROVIDED STRICTLY ON AN "AS IS WHERE IS" BASIS, AND EXPERIAN FURTHER EXPRESSLY DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE REGARDING THIS REPORT.

YOU AGREE TO INDEMNIFY EXPERIAN FOR ANY CLAIMS OR LOSSES, INCLUDING COSTS, EXPENSES AND ATTORNEYS FEES, INCURRED BY EXPERIAN ARISING DIRECTLY OR INDIRECTLY FROM YOUR IMPROPER OR UNAUTHORIZED USE OF AUTOCHECK VEHICLE HISTORY REPORTS.

Experian shall not be liable for any delay or failure to provide an accurate report if and to the extent which such delay or failure is caused by events beyond the reasonable control of Experian, including, without limitation, "acts of God", terrorism, or public enemies, labor disputes, equipment malfunctions, material or component shortages, supplier failures, embargoes, rationing, acts of local, state or national governments, or public agencies, utility or communication failures or delays, fire, earthquakes, flood, epidemics, riots and strikes.

These terms and the relationship between you and Experian shall be governed by the laws of the State of Illinois (USA) without regard to its conflict of law provisions. You and Experian agree to submit to the personal and exclusive jurisdiction of the courts located within the county of Cook, Illinois.

CCC ONE. MARKET VALUATION REPORT

SUPPLEMENTAL INFORMATION

Owner: Gilmore, Rachel
Claim: 000436361489D01

NHTSA VEHICLE RECALL

NHTSA Campaign ID : 14V655000

Mfg's Report Date : OCT 20, 2014

Component : AIR BAGS

Potential Number Of Units Affected : 247,000

Summary : Toyota Motor Engineering and Manufacturing (Toyota) is recalling certain model year 2002-2005 Lexus SC and Toyota Sequoia and 2003-2005 Toyota Tundra, Corolla, Corolla Matrix and Pontiac Vibe vehicles that were originally sold, or are currently registered, in high absolute humidity areas of southern Florida, along the Gulf Coast, Puerto Rico, Hawaii, the U.S. Virgin Islands, Guam, Saipan and American Samoa. The inflators in the front passenger air bags are susceptible to rupture in the event of a crash necessitating the deployment of the front passenger air bag.

Consequence : In the event of a crash necessitating deployment of the front passenger's frontal air bag, the inflator could rupture with metal fragments striking and potentially seriously injuring the passenger seat occupant or other occupants.

Remedy : Toyota will notify owners of affected Toyota and Lexus vehicles and General Motors will notify owners of affected Pontiac Vibe vehicles. Toyota, Lexus, and GM dealers will replace the passenger side air bag inflator, free of charge. If a replacement inflator is not available, as an interim measure, the dealer will disable the front passenger air bag and advise the customer not to use the front passenger seat until a replacement inflator is installed. Toyota will begin its owner notification and remedy of the affected Toyota and Lexus vehicles on or around October 25, 2014. Details on GM's notification and remedy schedule are pending. Owners may contact Toyota customer service at 1-800-331-4331. Pontiac Vibe owners may contact GM at 1-800-521-7300.

Notes : Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

The National Highway Traffic Safety Administration has issued 2 safety related recall notices that may apply to the above valued vehicle.

NHTSA Campaign ID : 15V286000

Mfg's Report Date : MAY 13, 2015

Potential Number Of Units Affected : 300,000

Summary : Toyota Motor Engineering & Manufacturing (Toyota) is recalling certain model year 2005-2007 Lexus SC, Toyota Corolla, Corolla Matrix, Sequoia, and Pontiac Vibe, and 2005-2006 Toyota Tundra vehicles that were originally sold, or ever registered, in Florida, along the Gulf Coast, Puerto Rico, Hawaii, the U.S. Virgin Islands, Guam, Saipan and American Samoa. The inflators in the front passenger air bags are susceptible to rupture in the event of a crash necessitating the deployment of the front passenger air bag.

Remedy : Toyota will notify owners, and dealers will replace the passenger side front air bag, free of charge. Owners may contact Toyota customer service at 1-800-331-4331. Pontiac Vibe owners may contact GM at 1-800-762-2737. Note: This recall is an expansion of recall 14V-655.



Change Manufacturer | Change Year & Model | Change ZIP | Change Options | Values

ELECTRONICALLY FILED
 Pulaski County Circuit Court
 Terri Hollingsworth, Circuit/County Clerk
 2019-Mar-04 09:16:51
 60CV-19-1235
 C06D12 : 1 Page

2003 Honda

VTX1800C3 Prices

Values Specifications Special Notes

Values

	Suggested List Price	Low Retail	Average Retail
Base Price	\$12,499	\$2,985	\$3,925

Options (Change)

Total Price	\$12,499	\$2,985	\$3,925
-------------	----------	---------	---------

Make sure you're protected!
Insure your Motorcycle for as low as just \$75/year.*

Research another motorcycle

Go

Truck deals, pricing and values

Go



ELECTRONICALLY FILED
Pulaski County Circuit Court
Terri Hollingsworth, Circuit/County Clerk
2019-Mar-04 09:16:51
60CV-19-1235
Page 48 of 55



Cycle Trader

2003 Honda VTX1800R VTX ...

Used Cruiser Motorcycle In Jonesboro, AR 72401

1-833-233

Email

Save Listing



DETAILS FROM SELLER

Condition: Used

Year: 2003

Make: Honda

Model: VTX1800R VTX 1800 R

Category: Cruiser

Type: Motorcycle

Location: Jonesboro, AR

Mileage: 11,895

Price: \$4,499

View On The Dealer's Website

DESCRIPTION & COMMENTS

2003 Honda VTX1800R VTX 1800 R, PERFECT VTX1800R WITH LOW MILES AND LOTS OF EXTRAS. NEW TIRES TOO. ALL SERVICED AND READY TO GO. CALL CARI OR BRENT 870-919-5721 JONESBORO CYCLE AND ATV 2800 FAIR PARK BLVD JONESBORO, AR 72401 870-935-2887 870-935-2889 FAX PRICE DOES NOT INCLUDE FEES WWW.JONESBOROCYCLE.COM WWW.KAWASAKI.COM WWW.TEXTRONOFFROAD.COM WWW.KTMUSA.COM WWW.KYMCUSA.COM WWW.HAMMERHEADOFFROAD.COM

EXHIBIT

4

PERFECT VTX1800R WITH LOW MILES AND LOTS OF EXTRAS. NEW TIRES TOO. ALL SERVICED AND READY TO GO.

CALL CARI OR BRENT 870-919-5721

JONESBORO CYCLE AND ATV

2800 FAIR PARK BLVD

JONESBORO, AR 72401

870-935-2887

870-935-2889 FAX

PRICE DOES NOT INCLUDE FEES

WWW.JONESBOROCYCLE.COM

WWW.KAWASAKI.COM

WWW.TEXTRONOFFROAD.COM

WWW.KTMUSA.COM

WWW.KYMCUSA.COM

WWW.HAMMERHEADOFFROAD.COM

MESSAGE FROM JONESBORO CYCLE & ATV

The best quality bikes for the best prices.

DISCLAIMERS

Cycle Trader Disclaimer:

The information provided for each listing is supplied by the seller and/or other third parties.

CycleTrader.com is not responsible for the accuracy of the information. Please refer to the [Cycle Trader Terms of Use](#) for further information.



Jonesboro Cycle & ATV

1-833-233-7485

2800 Fair Park Blvd

Jonesboro, AR 72401

SUBSCRIBE TO OUR NEWSLETTER:



Enter Your Email

SUBMIT

Cars for
SaleSell Your
CarService &
Repair

Research

Videos &
Reviews

ELECTRONICALLY FILED
Pulaski County Circuit Court
Terri Hollingsworth, Circuit/County Clerk
2019-Mar-04 09:16:51
60CV-19-1235
C06D12 : 6 Pages

Used Toyota Corolla for Sale

Sort by: Relevance: Best Match

Filter Results

New Search

Get the latest
listings by email

Email

Sign Up

7 matches

Save Search

Clear All

X Toyota

X Corolla

X 2005

X S

X Used

Location

Search within

500 miles

72201

Show me cars available for home
deliveryInclude vehicles outside of my search
radius that can be delivered to my home.

New/Used

☐ All ☐ New ☒ Used

☐ Certified Pre-Owned

Year

FEATURED



Steve Lanc

GOOD DE

FAIR PRIC

GOOD DEAL

★★★★★

(888) 707-3

Dealer Website



Currently in stock:

476 New

102 CPO

2015 Toy...	2013 Toy...	2016 Toy...
486,152	90,251	51,280
12,239	297	53,951
46,844		

EXHIBIT

5

2005

to

2005

Make

Toyota

☐ Acura☐ BMW☐ Chevrolet☐ Ford☐ Honda

Show all Makes in A-Z

Trim

S

☐ Base or Unknown☐ CE☐ LE

Price

Min Price

Max Price

Mileage

☐ 150,000 or less (3)USED  Save ☐ Compare**\$3,699** | 167,689 mi.

2005 Toyota Corolla S

GREAT DEAL

Indianapolis Motor Sports

- (317) 644-1643

★ 4.4 (14 reviews) |

480 mi. from 72201

Ext. Color: White

Int. Color: Gray

Transmission: Automatic

Drivetrain: FWD



CARFAX Report

Check Availability

USED  Save ☐ Compare**\$4,975** | 202,520 mi.

2005 Toyota Corolla S

GOOD DEAL

Toyota of Somerset

- (606) 575-3146

★ 4.9 (746 reviews) |

458 mi. from 72201 |

Authorized Toyota Dealer

Ext. Color: Gray

Int. Color: Black

Transmission: Other /

Unknown

Drivetrain: FWD



Free CARFAX Report

Check Availability

☐ 200,000 or less (5)☐ 250,000 or less (7)**Deal Rating**☐ **GREAT DEAL** (1)☐ **GOOD DEAL** (4)**Features**☐ Alloy Wheels (1)☐ Premium Sound System (1)☐ Rear Seat Entertainment (1)**Body Style** >**Exterior Color** >**Interior Color** >**Drivetrain** >**Transmission** >**Cylinders** >**Photos** >**Fuel** >**Door Count** >**Dealer Ratings** >

USED Save Compare

\$4,690 215,081 mi.**2005 Toyota Corolla S****GOOD DEAL****Toyota South** - (888) 253-2892

★ 4.9 (377 reviews) |

491 mi. from 72201 |

Authorized Toyota Dealer

Ext. Color: Gray

Int. Color: Other

Transmission: Automatic

Drivetrain: FWD

[Free CARFAX Report](#)[Check Availability](#)

USED Save Compare

\$5,495 151,466 mi.**2005 Toyota Corolla S****GOOD DEAL****Elvis's Autos LLC**

- (901) 290-0403

★ 2 (2 reviews) |

140 mi. from 72201

Ext. Color: Blue

Int. Color: Gray

Transmission: Automatic

Drivetrain: FWD

[CARFAX Report](#)[Check Availability](#)

Listing Date



Seller Type



Keywords



USED Save Compare

\$4,950 135,794 mi.

2005 Toyota Corolla S

GOOD DEAL

MJ Auto Broker

- (404) 935-6717

★ 5 (1 reviews) |

455 mi. from 72201

Ext. Color: Blue

Int. Color: Gray

Transmission: Automatic

Drivetrain: FWD



[CARFAX Report](#)

Check Availability

USED Save Compare

\$3,850 122,600 mi.

2005 Toyota Corolla S

Kranthi (Private Seller)

395 mi. from 72201

Ext. Color: White

Int. Color: Brown

Transmission: Automatic

Drivetrain: 4x2/2-wheel drive



[CARFAX Report](#)

Check Availability

JUST ADDED

USED  Save Compare

Not Priced

120,946 mi.

2005 Toyota Corolla S

Speedway Ford

- (866) 530-1538

★ 5 (176 reviews)

467 mi. from 72201

Ext. Color: Gold

Int. Color: Other

Transmission: Automatic

Drivetrain: FWD



[CARFAX Report](#)

[Check Availability](#)

[Prev](#)

[Next](#)

1

20 Per Page

* Title, other fees, and incentives are not included in this calculation, which is an estimate only. Monthly payment estimates are for illustrative purposes only and do not represent a financing offer from the seller. Other taxes may apply. The information on vehicles provided in this service is supplied by the seller or other third parties; Cars.com is not responsible for the accuracy of such information. Cars.com provides this service and materials without representations or warranties of any kind, either expressed or implied. See our terms of service for more details.

Our Company

Buying & Selling

Our Partners

[About Us](#)

[Contact Us](#)

[Advertise](#)

[Investor Relations](#)

[Careers](#)

[NewCars.com](#)

Contact Cars.com Sell Your Car RepairPal.com
Mobile Apps Car Book Values
Site Map Car Dealers
Careers Car Insurance

Car Insurance

Terms of Service Privacy Statement Ad Choices

© 2019 Cars.com All rights reserved.



Compare 0 / 4

Let's get started!

cars by clicking 'Compare' on the card listings.
You can select up to 4 to compare.

Ok, Got It!